



July 5, 2025

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VIA ECF

Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

Re: *Engesser et al. v. McDonald*,  
**Civil Action No. 25-cv-01689 (FB) (LKE)**

Dear Judge Block:

We represent Plaintiffs in the above-captioned matter. We respectfully submit this letter on behalf of all Parties in connection with Plaintiffs' unopposed motion to certify a settlement class pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure; appoint Patterson Belknap Webb & Tyler LLP and New York Legal Assistance Group as class counsel and the Named Plaintiffs as class representatives; grant preliminary approval of the settlement; and schedule a remote fairness hearing to occur no later than August 8, 2025.

The Parties respectfully request that Your Honor grant the requested relief as soon as practicable so that notice may be provided to the members of the settlement class and the class members afforded sufficient time to consider the settlement in advance of the remote fairness hearing. The Parties also emphasize that having a fairness hearing no later than August 8, 2025 is critical to the viability of the timeline for notice and fair hearing rights that have been negotiated around the clock since the Parties last appeared before Your Honor.

We appreciate the Court's attention to this important matter of great public interest.

Respectfully yours,

A handwritten signature in blue ink, appearing to read 'Lisa E. Cleary', with a stylized flourish at the end.

Lisa E. Cleary

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cc (by email or ECF)  
Caitlin Ross  
Emma Brill  
Rachel Summer, NYAG  
Samantha Buchalter, NYAG  
Elizabeth Jois, NYLAG  
Julia Russell, NYLAG